

May 16, 2005

Honorable Kevin J. Martin
Chairman

Federal Communications Commission

VIA FACSIMILE

Dear Chairman Martin:

It is my understanding that the Commission will be considering measures to help assure that voice over the internet phone service does not impede consumer access to emergency 911 services. The National Electronic Security Alliance supports that effort. As VoIP has expanded, consumers have suffered similar disruptions to their security alarm systems.

When consumers make a switch from a standard "Plain Old Telephone Service" (POTS) to voice over internet phone (VoIP) service they often assume, regardless of the fine print in any agreement, that this will have no impact on their phone service. Unfortunately due to the variety of methods used by VoIP providers the transition to VoIP may leave the customer without a reliable way for their alarm equipment to communicate offsite to a monitoring center and prevent a call for help in the event of a fire, burglary or other emergency. Because some VoIP providers vary the frequencies that can be transmitted from call to call, the equipment may work when tested at the time the customer switches to the VoIP service and experience a significant delay or outright failure at a later time.

As you know, monitored alarm systems play a vital role in protecting our infrastructure and protect lives and property in homes, businesses and government buildings. Delay or failure in sending a signal to the proper authorities can have serious consequences.

The alarm industry is doing its best to spread the word about the potential impact of a switch to VoIP service. Many companies have modified contracts and included reminders on the impacts in customer communications over the past several months. Some but not all VoIP providers have included warnings as well. In a perfect world, VoIP would be backward compatible with all devices that currently work successfully on traditional phone lines; unfortunately this is not the case.

As the Commission adopts policies affecting emergency 911 services, we urge you to examine the impact of VoIP on the embedded alarm systems protecting Americans in their homes and offices. Thank you for your consideration.

Sincerely,

Emil Wengel
Vice President & Legislative Chairman